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BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:	Group Art Unit: 2172
Raymond Guzman et al.	Examiner: Shahid Al Alam
Serial No.: 09/476,141	
Filed: January 3, 2000	
For: METHOD AND MECHANISM FOR IMPLEMENTING AND ACCESSING VIRTUAL DATABASE TABLE STRUCTURES	

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REPLY BRIEF UNDER 37 CFR § 1.193

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The applicants submit this Reply Brief pursuant to 37 CFR § 1.193 in response to the

Examiner's Answer mailed on June 3, 2003.

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REMARKS

The Examiner maintains, in the Examiner's Answer mailed on June 3, 2003, that claims 33-36, 39, 41-44, 47, 49-52, and 55 are anticipated by U.S. Patent 6,275,824 issued to O'Flaherty et al. (hereinafter "O'Flaherty").

In the Examiner's Answer, the Examiner states:

> One important capability of a database management system is the ability to define a virtual table and save that definition in the database as metadata with a user-defined name. A virtual table can be created without using any metadata from a source table. According to O'Flaherty virtual table's metadata can have user defined name which are different from source table metadata. Therefore, a virtual table does not have to be defined with database metadata. For example: if source table have two columns, one is the number of hours worked and other one is the rate per hour. A virtual table can made having a column called "Pay" which can be the result of source table's number of hours worked times rate columns. Thus, virtual table's metadata do not have to be defined within the source table metadata. Source table defined by the Appellant can easily be created from other source table and then virtual table can be created from new source table.

(Examiner's Answer at pgs. 6-7) (emphasis added).

Claim 33, however, does not recite "defin[ing] a virtual table and sav[ing] that definition in the database as metadata." Claim 33, which is representative of the rejected claims, recites "associating a record within said data source to a virtual table, wherein said virtual table is not defined with database metadata" (emphasis added). Thus, the Examiner is arguing the exact opposite of what is recited in claim 33.

In addition, claim 33 does not recite "[a] virtual table can be created without using any metadata from a source table." Claim 33 also does not recite a "virtual table's metadata can have user defined name which are different from source table metadata." Furthermore, claim 33 does not recite a "virtual table's metadata do not have to be defined within the source table metadata." Claim

33 recites "associating a record within said data source to a virtual table, wherein <u>said virtual table is</u> <u>not defined with database metadata</u>." (emphasis added).

Moreover, the Examiner's conclusions do not necessarily follow from the Examiner's statements. In particular, just because a "virtual table's metadata can have user defined name which are different from <u>source table metadata</u>" does not necessarily mean that "a virtual table does not have to be defined with <u>database metadata</u>." (emphasis added).

The Examiner cites the following passage of O'Flaherty as disclosing "associating a record within said data source to a virtual table, wherein said virtual table is not defined with database metadata," as recited in claim 33:

> One important capability of a database management system is the ability to <u>define a virtual table and save that definition in the database as metadata</u> with a user-defined name. The object formed by this operation is known as a View or a database view (the particular database views used in the present invention are hereinafter referred to as "dataviews"). As a virtual table, a dataview is not physically materialized anywhere in the database until it is needed. All accesses to data, (with the possible exception of data access for administrative purposes) is accomplished through dataviews. To implement a variety of privacy rules, a suite of a plurality of dataviews is provided. <u>Metadata about the privacy dataviews</u> (including the dataview name, names and data types of the dataview columns, and the method by which the rows are to be derived) <u>is stored persistently in the database metadata</u>, but the actual data presented by the view is not physically stored anywhere in association with the derived table. Instead, the data itself is stored in a persistent base table, and the view's rows are derived from the base table. Although the dataview is a virtual table, operations can be performed against dataviews just as they can be performed against the base tables.

(Col. 4, ll. 7-29) (emphasis added).

The cited passage, however, does not disclose "associating a record within said data source to a virtual table, wherein <u>said virtual table is not defined with database metadata</u>" as recited in claim 33. (emphasis added). The cited passage, in fact, teaches the exact opposite. In particular,

O'Flaherty specifically teaches that the "database management system . . . define[s] a virtual table and save[s] that definition in the database as metadata." (Col. 4, ll. 7-9). O'Flaherty further teaches that "[m]etadata about the privacy dataviews . . . is stored persistently in the database metadata." (Col. 4, ll. 18-22). Thus, applicants respectfully submit that O'Flaherty does not anticipate claim 33.

CONCLUSION

For the above reasons, applicants respectfully submit that rejection of claims 33-36, 39, 41-44, 47, 49-52, and 55 based on 35 U.S.C. § 102(e) has been overcome. Accordingly, applicants request that the Board of Patent Appeals and Interferences overrule the Examiner and allow claims 33-36, 39, 41-44, 47, 49-52, and 55.

Respectfully submitted,

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Dated: __7-1-03__   By: _____

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